

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

21 CR 446 (VSB)

-against-

NOTICE OF MOTION

ANDREW FRANZONE
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PLEASE TAKE NOTICE that upon the affirmation of Andrew Franzone, affirmation of Deborah Colson, Esq., accompanying exhibits, memorandum of law, and all prior pleadings and proceedings herein, Mr. Franzone will move this Court before the Honorable Vernon S. Broderick, United States District Judge for the Southern District of New York, located at 40 Foley Square, New York, N.Y., at a date and time to be fixed by the Court, for an Order:

- A. Suppressing Mr. Franzone's emails and other materials seized from Google in violation of the Fourth Amendment; and
- B. Reserving the right to make additional motions if necessary.

Dated: May 25, 2023
New York, N.Y.

/s/

Deborah Colson, Esq.
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